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262 Donegal Way
Martinez, California 94553

June 30, 1998

CALFED Bay-Delta Program
1416 Ninth street, Suite 1155
Sacramento, California 95814

Attn: Mr. Rick Breitenbach

Subject: Draft Programmatic Environmental Impact Statement/Environmental Impact Report
Comments

In the subject document the question is asked, "Are the assumptions ... valid?" The answer is no, the assumptions are biased to continue to provide for water to be diverted from the Delta. Realistically, this will probably continue, but I think the option of halting pumping should have been considered, possibly to show that halting pumping alone might not solve the problem. If it would solve the problem, then other sources and conveyances for the water would need to be investigated.

I think increasing the storage capacity of the Delta by flooding parts or all of the diked areas has merit. Was any study done to determine the size of flooded areas that would minimize to a negligible level the effects on the San Joaquin system and are areas of this size even available? Even if the entire Delta were flooded, would more water storage be needed, because the amount diverted is so relatively large? How many Los Vaqueros-type reservoirs would it take to store enough water to get through the critical periods when eggs and larva are present and the pumps should be shut down?

Flooding selected Delta islands or parts thereof could possibly have the same or better effect on flow as reworking or setting back levees, at the same time increasing storage to a greater extent.

Conservation and reuse of water should, of course, be looked at, but there thousands of scenarios for conservation depending on use, and chasing these myriad options for solutions should perhaps be part of a separate effort.

For me, the most critical part of this whole exercise involves restoring, maintaining and improving the aquatic habitat, and the most important aspect of this involves fish screens and intake structures.

First, the pumps should be shut off during the critical periods when non-motive lifeforms are likely to be impacted. Provide storage elsewhere to get through these periods of time.

Second, replace all screens with low velocity screens that are better than state-of-the-art. Design and construct tangential flow intake structures where the geometries are appropriate. Until the entrainment and capture problem is eliminated, no proposed

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"conveyance facility" will help in the solution.

Thank you for the opportunity to present my comments.

Sincerely,

Peter A. Beaver
925-295-1650 ext. 243

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ALISTO ENGINEERING GROUP

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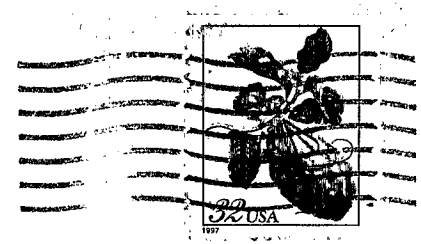

CALFED BAY DELTA PROGRAM
1416 NINTH ST., SUITE 1155
SACRAMENTO, CA 95814

ATTN: RICK BREITENBACH

DEPARTMENT OF WATER RESOURCES SACRAMENTO
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~~1777 OAKLAND BOULEVARD, SUITE 200 • WALNUT CREEK, CA 94596~~
P. O. BOX 27894, CONCORD, CA 94527.